

EXHIBIT F

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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 -----x
4 DONNA WOOD, et al, individually
5 and on behalf of all others
6 similarly situated,

7 Plaintiffs,

8 vs. 20 Civ. 2489 (LTS) (GWG)
9 MIKE BLOOMBERG 2020, INC.,

10 Defendant.

11 -----x

12
13 VIDEOTAPE DEPOSITION OF
14 RONALD LUIPPOLD
15 VIA ZOOM VIDEOCONFERENCE

16 November 29, 2022
17 10:00 a.m.

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23 Reported by:

24 Maureen Ratto, RPR, CCR

25

1 RONALD LUIPPOLD

2 VIDEOGRAPHER: We are going

3 back on the record at 1:30 Eastern

4 Time.

5 Q. Mr. Luippold, was there a
6 period of time in February or March of
7 2020 where your health issues precluded
8 you from being able to work for the
9 Campaign?

10 A. Towards the end of the
11 Campaign, yes.

12 Q. What health issues were you
13 experiencing toward the end of the
14 Campaign?

15 A. Nausea, a lot of pain and, you
16 know, it was debilitating neck pain, back
17 pain, all stuff that was caused by my
18 previous injuries, I guess.

19 Q. And when did you start
20 experiencing this debilitating pain?

21 A. I don't know exactly when this
22 happened. It was just right around the
23 time I got back from the debate in Las
24 Vegas, so it was probably the week after.

25 Q. And at the point when you had

1 RONALD LUIPPOLD

2 this onset of pain, were you performing
3 any work for the Campaign or did you stop
4 working altogether at that point?

5 A. No. I was still making phone
6 calls and I was doing stuff from home at
7 that point.

8 Q. Were there periods during the
9 day where you were unable to work because
10 of your debilitating pain?

11 A. Yes.

12 Q. Now, approximately how many
13 hours per day were you working during
14 this period of time, at the end of
15 February?

16 A. At that point I might have
17 been reduced to about six hours a day
18 versus the 12 that I had been performing
19 prior to that.

20 Q. Was there any period of time
21 where you were unable to perform any work
22 at all during your employment with the
23 Campaign?

24 A. A couple days, yeah, when I
25 was in the hospital, when I was at the

1 RONALD LUIPPOLD

2 hospital.

3 Q. And when were you in the
4 hospital?

5 A. It was March, it was towards
6 the end of the Campaign I believe. Maybe
7 -- yeah, I think it was in March.

8 Q. And how many days did you
9 spend in the hospital?

10 A. I don't recall. It was
11 definitely an extended period of time. I
12 don't know exactly how long. It brought
13 me into the spring months.

14 Q. More than a month?

15 A. Yes.

16 Q. While you were still in the
17 hospital were you still being paid by the
18 Campaign?

19 A. I don't recall.

20 Q. And were you admitted to the
21 hospital due to the issues that you just
22 described, nausea and debilitating neck
23 and back pain?

24 A. Yeah. Nausea was just a
25 side-effect. I really went for the

1 RONALD LUIPPOLD

2 debilitating back/neck pain. I was
3 getting to the point where I couldn't
4 move.

5 Q. Had you been experiencing the
6 neck and back pain? Like, had it been
7 increasing over time prior to the point
8 where you were hospitalized or was it
9 more of a sudden onset?

10 A. I don't recall. You know, to
11 be honest with you, I think it was the
12 plane ride back from Vegas I started
13 really having problems at that point. I
14 noticed it coming on more and more.

15 Q. Did you have to have surgery
16 at some point in 2020 due to these
17 issues?

18 A. I don't think so. I was just
19 in a brace for an extended period of
20 time, six to eight weeks, I think.

21 Q. During your employment with
22 the Campaign did you have to attend
23 doctors' appointments related to the
24 issues that you've testified about today?

25 A. Not that I recall.

1 RONALD LUIPPOLD

2 A. Yes.

3 Q. And then do you see
4 immediately above that there is a
5 response from you that says, "That sounds
6 great, Albert. It's in my schedule. I
7 will see you there was with all the
8 materials that you will need. Thank you
9 for your support."

10 A. Yes.

11 Q. And is it still your testimony
12 that you never wound up going to this
13 house party?

14 A. That's correct.

15 Q. Why did you not wind up not
16 actually attending?

17 A. As I recall, I was -- some
18 changes were being made in my district
19 and so I think either Ross Doty or Julian
20 -- I'm sorry, I want to say Julian --
21 Jacob Edelman attended with someone like
22 Ed Davis was there. I felt like they had
23 more experience to have someone whose got
24 more campaign experience there, I guess.

25 Q. The date of the house party

1 RONALD LUIPPOLD

2 that's mentioned in Mr. Bangert's email
3 of February 26th, was this the period of
4 time when you were in the hospital?

5 A. It might have been when it
6 started.

7 Q. And if you were in the
8 hospital then you wouldn't have been able
9 to attend the event; is that correct?

10 A. That's -- that's correct.

11 Q. Did you attend the DNC debate?

12 A. I did.

13 Q. And you were selected by the
14 Campaign to attend the debate, correct?

15 A. Yes.

16 Q. What, if anything, do you know
17 about why you personally were selected to
18 attend the debate?

19 A. It's my understanding it was
20 just a random pull from a hat.

21 Q. And you were in Las Vegas for
22 a period of less than 24 hours, correct?

23 A. Yes.

24 Q. And other than attending the
25 debate, itself, did you engage in any

1 RONALD LUIPPOLD

2 Q. And that was in February?

3 A. Late February.

4 Q. And when you became ill, how
5 many days per week were you working then?

6 A. I believe I was still working
7 every day until I could no longer. I
8 mean, I was working minimal hours, six
9 hours a day, if I recall, until I just
10 couldn't handle it anymore when I got in
11 the hospital.

12 Q. And what was the date when you
13 were hospitalized?

14 A. I don't recall that date.

15 Q. Do you have any records
16 regarding your hospitalization?

17 A. Not on me. I'm sure there are
18 records somewhere.

19 Q. Other than at the end when you
20 became ill, were there any weeks in which
21 you worked fewer than seven days?

22 A. No.

23 Q. As a field organizer did you
24 have any involvement in selling Campaign
25 merchandise?